

*United States Attorney
Southern District of New York*

August 10, 2020

BY ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Turkiye Halk Bankasi, A.S.,
S6 15 Cr. 867 (RMB)

Dear Judge Berman:

On July 1, 2020, the parties submitted to the Court a stipulated Protective Order, which was executed by counsel for Türkiye Halk Bankası, A.S (“Halkbank”) on June 16, 2020. In response to certain matters raised by the Court, the parties now submit a revised stipulated Protective Order, executed by counsel for Halkbank on July 9, 2020. On July 1, 2020, the Government began producing Rule 16 discovery requested by Halkbank based on the defendant’s execution of the initial proposed stipulated Protective Order. Though discovery production is not yet complete, the Government has continued to provide discovery to the defendant on a rolling basis since that date.

Respectfully submitted,

AUDREY STRAUSS
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by: /s/
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cc: Counsel of record (by ECF)